## STATE OF IOWA DEPARTMENT OF COMMERCE IOWA UTILITIES BOARD

IN RE: Dakota Access, LLC.

DOCKET NOs: FCU-2016-0006; HLP-2014-0001

**COMPLAINT FILING** 

I, Erin Riley, respectfully submit this 27<sup>th</sup> day of June, 2016, a formal complaint against Dakota Access, LLC. This complaint may be considered in joinder to Docket No. FCU-2016-0006 for property DAPL-IA-WA-036.000, but consists of additional and separate grievances related to pipeline construction without completed Easement Agreements and without final payments rendered to all landowners.

Regarding a "48-hour Notice of Commencement of Construction" sent by USPS mail

June 17, 2016: Dakota Access, LLC, will be in breach for construction of their pipeline on

property IA-WA-036.000. Not all signed revised Easement Agreements from the landowners

have been received, and final payments to the landowners have not been made to this date. Thus,

Dakota Access, LLC, will be engaging in construction without final contracts, permits, and

completing payments owed.

By: /s/ Erin Riley

Erin Riley, June 27th, 2016

Ern Riley